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Anh Nguyen
02/18/04 06:38 AM

To: NCIC HPV@EPA
cc:
Subject: Environmental Defense comments on Hydroxybenzene Sulfonic Acid (CAS# 1333-39-7)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 02/18/2004 06:34 AM -----

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02/17/2004 02:21 PM

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Subject: Environmental Defense comments on Hydroxybenzene Sulfonic Acid (CAS# 1333-39-7)

(Submitted via Internet 2/17/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Willliam.smock@verizon.net)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Hydroxybenzene Sulfonic Acid (CAS# 1333-39-7).

The Aromatics Sulfonic Acids Association (ASAA), in response to EPA's High Production Challenge, has submitted Robust Summaries and a Test Plan describing available data and proposing additional studies for hydroxybenzene sulfonic acid. Our review of this submission indicates the Test Plan and Robust Summaries are well-organized and concisely describe the limited data available for this chemical. The Test Plan and Robust Summaries are generally well-written; however, they could be more informative. For example, no information is provided to describe production, transport, uses or potential for human and environmental exposure for this chemical.

A list of synonyms and alternative chemical names or trade names should be given for hydroxybenzene sulfonic acid, given that it is referred to as phenol sulfonic acid in numerous references in the Robust Summaries.

Hydroxybenzene sulfonic acid is a data-poor chemical; however, as described in the Introduction, it is an aromatic sulfonic acid and, as such, is sponsored by ASAA. Thus, it would seem appropriate that data developed for other members of this group of chemicals, e.g., benzene sulfonic acid and toluene sulfonic acid, might be used to bridge data to address the required SIDS elements for this chemical; however, that has not been done. Review of the limited data described for this chemical and other chemicals in the same category indicates that they all have low acute toxicity, are highly soluble in water and may be biodegradable. Thus, it is unlikely to accumulate in the environment.

ASAA has proposed a number of additional studies of hydroxybenzene sulfonic acid to address SIDS elements required under EPA's HPV Challenge. We support the conduct of those studies addressing the biodegradation, aquatic toxicity and mutagenicity of this chemical. We do not support the conduct additional studies of mammalian toxicity. That is, the acute toxicity of hydroxybenzene sulfonic acid can almost certainly be attributed primarily, if not entirely, to the fact that they it is a strong acid, and as such,

can be expected to be highly irritating. Because of its high polarity and water solubility, it would not be expected to be absorbed appreciably into systemic circulation or across cell membranes, and should be rapidly excreted; hence, it is not be expected to exert systemic toxicity to mammals at doses below which irritation would account for the majority, if not the entirety, of the adverse effects. Thus, although we appreciate ASAA's willingness to conduct additional animal studies to determine the repeated dose toxicity and developmental/reproductive toxicity of hydroxybenzene sulfonic acid, we do not think such studies are well-advised. That is, the toxicity of strong acids is well established and they all act in essentially the same way. Thus, we do not believe that it would serve any purpose to subject additional animals to the irritating effects of another strong acid in order to fill out the matrix of SIDS elements. We encourage EPA to exempt ASAA from the conduct of these studies.

Thank you for this opportunity to comment.

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